

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:

*Gaston Roberts et al. v. Zhejiang
Huahai Pharmaceutical Co., et al.,*

Case No. 1:20-cv-00946-RBK-JS

MDL No. 2875

Honorable Renée Marie Bumb
District Court Judge

DEFENDANTS' NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that on a date to be determined by the Court, the undersigned counsel will bring Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, and Princeton Pharmaceutical Inc.'s ("Defendants'") Motion for Summary Judgment. Defendants will ask for entry of an order granting summary judgment in favor of Defendants and dismissing Plaintiff's claims in their entirety, with prejudice.

PLEASE TAKE FURTHER NOTICE that in support of their motion, Defendants shall rely upon the Brief submitted herewith, the L.R. 56.1 Statement of Material Facts Not in Dispute, and the Declaration of Nina Rose, Esq., together with exhibits; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: May 22, 2025

Respectfully submitted,

/s/ Jessica Davidson

Jessica Davidson (*pro hac vice*)

Allison M. Brown

KIRKLAND & ELLIS LLP

601 Lexington Avenue

New York, NY 10022

Tel: (212) 446-4723

jessica.davidson@kirkland.com

alli.brown@kirkland.com

Nina R. Rose (*pro hac vice*)

Jordan M. Schwartz (*pro hac vice*)

KIRKLAND & ELLIS LLP

1301 Pennsylvania Avenue

Washington, D.C. 20004

Tel: (202) 389-3394

Fax: (202) 389-5200

nina.rose@kirkland.com

jordan.schwartz@kirkland.com

*Attorneys for Defendants Zhejiang
Huahai Pharmaceutical Co., Ltd., Solco
Healthcare U.S., LLC, and Princeton
Pharmaceutical Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 22, 2025, a true and correct copy of the foregoing document was served upon counsel of record via operation of the Court's electronic filing system.

Dated: May 22, 2025

Respectfully submitted,

/s/ Jessica Davidson

Jessica Davidson (*pro hac vice*)

KIRKLAND & ELLIS LLP

601 Lexington Avenue

New York, NY 10022

Tel: (212) 446-4723

jessica.davidson@kirkland.com

*Attorney for Defendants Zhejiang
Huahai Pharmaceutical Co., Ltd., Solco
Healthcare U.S., LLC, and Princeton
Pharmaceutical Inc.*